

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
TRENTON VICINAGE**

ASSOCIATION OF NEW JERSEY RIFLE
& PISTOL CLUBS, INC., BLAKE
ELLMAN, and MARC WEINBERG,

Plaintiffs,

v.

MATTHEW PLATKIN, in his official
capacity as Attorney General of New Jersey,
PATRICK J. CALLAHAN, in his official
capacity as Superintendent of the New
Jersey Division of State Police,
RYAN MCNAMEE, in his official capacity
as Chief of Police of the Chester Police
Department, and
JOSEPH MADDEN, in his official capacity
as Chief of Police of the Park Ridge Police
Department,

Defendants.

HON. PETER G. SHERIDAN

Civil Action No.
3:18-cv-10507

CIVIL ACTION

**[PROPOSED] ORDER
EXCLUDING THE TESTIMONY
OF EMANUEL KAPELSOHN AND
CLAYTON CRAMER**

MARK CHEESEMAN, TIMOTHY
CONNELLY, and FIREARMS
POLICY COALITION, INC.,

Plaintiffs,

v.

MATTHEW J. PLATKIN, in his
official capacity as Acting Attorney
General of New Jersey, PATRICK J.
CALLAHAN, in his official capacity
as Superintendent of the New Jersey

HON. RENEE M. BUMB

Civil Action No.
1:22-cv-4360

State Police, CHRISTINE A. HOFFMAN, in her official capacity as Acting Gloucester County Prosecutor, and BRADLEY D. BILLHIMER, in his official capacity as Ocean County Prosecutor,

Defendants.

BLAKE ELLMAN, THOMAS R. ROGERS, and ASSOCIATION OF NEW JERSEY RIFLE & PISTOL CLUBS, INC.,

Plaintiffs,

v.

MATTHEW J. PLATKIN, in his official capacity as Attorney General of New Jersey, PATRICK J. CALLAHAN, in his official capacity as Superintendent of the New Jersey Division of State Police, LT. RYAN MCNAMEE, in his official capacity as Officer in Charge of the Chester Police Department, and KENNETH BROWN, JR., in his official capacity as Chief of the Wall Township Police Department,

Defendants.

HON. PETER G. SHERIDAN

Civil Action No.
3:22-cv-04397

THIS MATTER having been opened to the Court by Matthew J. Platkin, Attorney General of New Jersey, with Daniel M. Vannella, Assistant Attorney General, appearing on behalf of Defendants Matthew J. Platkin, Patrick J. Callahan,

Christine A. Hoffman, and Bradley D. Billhimer (collectively, “State Defendants”), pursuant to Federal Rule of Evidence 702 and Federal Rule of Civil Procedure 26(e)(1)(A), for an Order Excluding the Testimony of Clayton Cramer and Emanuel Kapelsohn, and the Court having considered the matter and for good cause shown;

IT IS on this _____ day of _____, 20____,

ORDERED that the State Defendants’ Motion is hereby **GRANTED**; and it is further

ORDERED that the testimony of Emanuel Kapelsohn and Clayton Cramer, pursuant to Rule of Evidence 702, is hereby excluded from these consolidated matters; and it is further

ORDERED that the supplemental productions of Emanuel Kapelsohn identified as Exhibits 25 and 26 of the Declaration of Daniel M. Vannella submitted in support of their Motion; and the portion of Mr. Kapelsohn’s August 29, 2023 letter (Exhibit 24 of the Vannella Declaration) describing them, are hereby struck from consideration in these consolidated matters, pursuant to Rule of Civil Procedure 28(e)(1)(A); and it is further

ORDERED that the August 31, 2023 Supplemental Report of Clayton Cramer (Exhibit 30 of the Vannella Declaration), is hereby struck from consideration

in these consolidated matters, pursuant to Rule of Civil Procedure 28(e)(1)(A); and
it is further

ORDERED that a copy of this Order shall be served upon the parties within
ten days of receipt hereof.

HON. PETER G. SHERIDAN, U.S.D.J.